

May 15, 2015

Ms. Rebecca Chu  
U.S. Environmental Protection Agency, Region 10  
1200 Sixth Avenue, AWT-121  
Seattle, Washington 98101

**BY E-MAIL ONLY**

**RE: MONTHLY PROGRESS REPORT – APRIL 2015  
JORGENSEN FORGE EARLY ACTION AREA – REMOVAL ACTION  
IMPLEMENTATION  
U.S. EPA DOCKET NO. CERCLA-10-2013-0032  
SEATTLE, WASHINGTON  
FARALLON PN: 831-032**

Dear Ms. Chu:

Farallon Consulting, L.L.C. (Farallon) has prepared this monthly progress report on behalf of Earle M. Jorgensen Company (EMJ) to document the activities conducted during April 2015 at the Lower Duwamish Waterway Superfund Site Jorgensen Forge Early Action Area (Site) in Seattle, Washington. This monthly progress report was prepared in accordance with the requirements of the Administrative Settlement Agreement and Order of Consent (AOC) for Removal Action Implementation at the Site issued by U.S. Environmental Protection Agency (EPA) Region 10 on November 5, 2012 under EPA Docket No. CERCLA-10-2013-0032. To date, approximately 75 percent of the required work is complete.

EMJ received written notice from EPA on November 25, 2014 that EMJ is in non-compliance with the AOC for the performance of the Non-Time Critical Removal Action of contaminated sediments and associated shoreline bank soils at the Site. On December 9, 2014, EMJ issued a written notice of objection and requested Dispute Resolution under the provisions of the AOC. EMJ and EPA held technical meetings on January 8, January 16, and February 25, 2015 to discuss the technical issues identified in the written notices. In a March 2, 2015 letter from EPA to EMJ, EPA suspended the dispute negotiation period indefinitely to allow the time necessary for implementation of additional sampling and assessment of the analytical results. In a March 23, 2015 letter EPA requested EMJ develop sampling and analysis plans to perform additional surface and subsurface sediment sampling. EMJ submitted the aforementioned plans for to EPA on April 22, 2015.

This monthly progress report provides:

- A summary of field activities conducted during April 2015;
- Analytical results for samples collected during April 2015;
- A summary of deliverables submitted and received during April 2015;



- A summary of technical and regulatory meetings during April 2015;
- A summary of planned activities, meetings, and deliverables for May and June 2015; and
- A summary of deviations from the AOC schedule anticipated for May and June 2015.

#### **FIELD ACTIVITIES – APRIL 2015**

Farallon performed a Site visit on April 29, 2015 to observe the stormwater treatment system at the Site and to assess the feasibility of collecting catch basin solids samples as part of the scope of work for the Operations, Monitoring, and Maintenance Plan (OMMP) Addendum No. 1.

#### **ANALYTICAL RESULTS – APRIL 2015**

No laboratory analytical results were obtained in April 2015.

#### **DELIVERABLES – APRIL 2015**

The Monthly Progress Report for March 2015 was submitted to EPA on April 16, 2015. OMMP Addendum No. 2 and the Construction Quality Assurance Project Plan Modification were submitted to EPA on April 22, 2015.

#### **TECHNICAL AND REGULATORY MEETINGS – APRIL 2015**

In accordance with the Memorandum of Understanding between EMJ, Jorgensen Forge, and The Boeing Company (Boeing), the parties participated in a joint project coordination meeting with Boeing and EPA on April 13, 2015, and a coordination meeting on April 27, 2015.

#### **PLANNED ACTIVITIES, MEETINGS, AND DELIVERABLES – MAY AND JUNE 2015**

##### **Activities**

No field activities are planned in May and June 2015.

##### **Meetings**

Project coordination meetings with Boeing are scheduled to occur semi-monthly during April 2015, and a joint project coordination meeting with Boeing and EPA is scheduled for May 11, 2015.

##### **Deliverables**

The following deliverables have been or will be provided to EPA during May and June 2015:

- Second Revised Pre-Final Certification Inspection Report by May 4, 2015;
- OMMP Addendum No.1 will be submitted to EPA by May 22, 2015; and
- Monthly Progress Report – May 2015 by June 15, 2015

#### **DEVIATIONS FROM AOC SCHEDULE – MAY AND JUNE 2015**

No deviations from the AOC schedule are anticipated in May and June 2015.



## CLOSING

Farallon trusts that this monthly progress report provides sufficient information for EPA. If you have questions regarding this project, please contact the undersigned at (425) 295-0800.

Sincerely,

**Farallon Consulting, L.L.C.**

Amy Essig Desai  
Principal

cc: Mr. E. Gilbert Leon Jr., EMJ (by e-mail only)  
Mr. Miles Dyer, Jorgensen Forge Corporation (by e-mail only)  
Messrs. William Joyce and Ian Sutton; Joyce Ziker Parkinson, PLLC (by e-mail only)  
Messrs. Ryan Barth and David Templeton; Anchor QEA, LLC (by e-mail only)

AED:bw